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Christopher Sulit

IN THE UNITED STATES DISTRICT COURT

THE NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO

JAMES BRADY, TRAVIS CALL,
SARAH CAVANAGH, JULIA
LONGENECKER, PEDRO NOYOLA
and CHRISTOPHER SULIT, individually
and on behalf of all others similarly
situated,

Plaintiffs,

vs.

DELOITTE & TOUCHE LLP, a limited
liability partnership; DELOITTE TAX
LLP; and DOES 1-10, inclusive,

Defendants.

CASE NO.: C-08-00177 SI

**DECLARATION OF WILLIAM A.
BAIRD IN SUPPORT OF
STIPULATION AND [ORDER] RE:
FILING DATE OF SECOND
AMENDED COMPLAINT**

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 Santa Monica, CA 90405

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 2 1. I am an attorney admitted to practice before all courts in the State of
 3 California and I am a senior associate of the law firm of Milstein, Adelman, & Kreger
 4 LLP, counsel of record for Plaintiffs ("Plaintiffs") in this action. I make this
 5 Declaration from my own personal knowledge and, if called upon, would and could
 6 competently testify to the following matters.

7 2. On May 30, 2008, the Court ordered Plaintiffs to file an amended
 8 complaint ("Second Amended Complaint") clarifying the scope of the putative class
 9 by June 13, 2008.

10 3. The plaintiff in the case of *Stepan Mekhitarian v. Deloitte & Touche,*
 11 *(ICS) LLC and Deloitte Tax, LLP*, Case No. CV-07-00412-DSF (MAN)
 12 ("*Mekhitarian*") in the Central District of California is expected to file a motion for
 13 class certification on approximately June 13, 2008 on behalf of certain Tax
 14 employees of Defendants.

15 4. The parties believe it will facilitate Plaintiffs here in clarifying the scope
 16 of the putative class in this case by seeing the scope of the class sought in
 17 *Mekhitarian* when the class certification motion is filed in that case.

18 5. The parties agree that it will be most efficient for Plaintiffs to refrain
 19 from filing a Second Amended Complaint until after the class certification motion is
 20 filed in *Mekhitarian*. Accordingly, the parties request that Plaintiffs date for filing a
 21 Second Amended Complaint be extended from June 13, 2008 to June 30, 2008.

22 6. This requested extension will have no impact on the Further Status
 23 Conference presently scheduled for August 15, 2008.

24 I declare under penalty of perjury under the laws of the State of California that
 25 the foregoing is true and correct. Executed this 10th day of June, 2008, in Santa
 26 Monica, California.

27 /s/ WILLIAM A. BAIRD